



June 2, 2025

Via ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Michael Smith, 24 Crim. 504 (JGK)*

Dear Judge Koeltl:

We write on behalf of our client, Michael Smith, to respectfully request an adjournment of the status conference scheduled for June 5, 2025. The Government joins in this request.

As the Court knows, discovery in this matter has been voluminous. Over 5.5 million files have been produced to date, and the Government anticipates producing any remaining discovery within the next month. The adjournment is needed because Mr. Smith needs additional time to review this discovery, as well as make decisions about potential motion practice.

If the Court grants this request, The parties are available the weeks of July 31, 2025, and August 4, 2025. Further, Mr. Smith consents to an exclusion of time under the Speedy Trial Act, in the interests of justice, between June 5 and the new conference date.

We appreciate the Court's consideration.

Respectfully submitted,

/s/ Justine A. Harris

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/s/ Noell Tin

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